



Federal Express Tracking#: 8019 6577 2568

February 27, 2015

Office of Enforcement and Compliance Assurance
Office of Federal Activities
International Compliance Assurance Division (2254A)
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

**Re: 2014 Annual Export Report
Delaware City Refining Company
EPA ID Number: DEN201000006**

Dear Administrator,

The Delaware City Refining Company LLC ("DCRC") is submitting this Annual Report for the 2014 calendar year for hazardous waste that was exported to a foreign country from our refinery located in Delaware City, DE. Please note that Omni Vision International, Inc. (for Union Corporation) and Clean Harbors – Canada may have filed similar reports for the waste streams (Spent Hydrotreating Catalyst and Primary Solids/API sludge, respectively) identified in this report.

This report has been prepared in accordance with the requirements of 40 CFR 262.56.

(a)(1) The EPA identification number, name, and mailing and site address of the exporter:

EPA ID No. DEN201000006
Delaware City Refining Company LLC
4550 Wrangle Hill Road
Delaware City, DE 19706

(a)(2) The calendar year covered by the report:

2014

received
SON 3/03/2015



(a)(3) The name and site address of each consignee:

Consignee #1 (Spent Hydrotreating Catalyst)

Union Corporation #548
Okmyoung-Ri, Daesongmyon,
Namqu, Pohang City
Kyungsanbuk-Do, Korea

Consignee #2 – (Environmentally Hazardous Substances - waste codes F037 & K051)

Clean Harbors Canada, Inc.
4090 Telfer Road RR#1
Corunna, Ontario NON 1G0

(a)(4) By consignee, for each hazardous waste exported, a description of the hazardous waste, the EPA hazardous waste number (from 40 CFR part 261, subpart C or D), DOT hazard class, the name and US EPA ID number (where applicable) for each transporter used, the total amount of waste shipped and number of shipments pursuant to each notification:

Consignee #1 (Union Corporation)

Spent Hydrotreating Catalyst, K171, DOT Hazard Class 4.2
Transporter: Freehold Cartage, Inc. (EPA ID# NJD054126164)
Total Amount of Waste Shipped: 18.065 Tons
Number of Shipments: 1 shipment

Consignee #2 (Clean Harbors Canada, Inc.)

Waste Environmentally Hazardous Substances (Primary sludge), F037, Hazard Class 9
Transporter: Price Trucking Corporation (EPA ID# NYD046765574)
Total Amount of Waste Shipped: 42.74 Tons
Number of Shipment: 3 shipments

Waste Environmentally Hazardous Substances (API Separator Sludge), K051, Hazard Class 9
Transporter: Price Trucking Corporation (EPA ID# NYD046765574)
Total Amount of Waste Shipped: 109.605 Tons
Number of Shipment: 8 shipments



(a)(5) Except for hazardous waste produced by exporters of greater than 100 kg but less than 1000 kg in a calendar month, unless provided pursuant to §262.41, in even numbered years:

(i) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated; and

Waste #1 – Spent Hydrotreating Catalyst

The goal of the DCRC is to continuously reduce hazardous waste generation through process improvement and recycling. The DCRC constantly evaluates and optimizes production processes to extend the catalyst life. The DCRC also actively seeks opportunities for viable alternatives. The DCRC's preference is reclamation or reuse of these spent hydrotreating catalysts (K171) as we resort to disposal if recycling efforts are deemed infeasible. As a result the spent hydrotreating catalysts were reclaimed for base metals at Union Corporation in Korea.

Waste #2 - Waste Environmentally Hazardous Substances (primary sludge and API separator sludge)

These waste streams were produced episodically in 2014 via the clean-out of process equipment (i.e. API separators and portions of the sewer system) located at the DCRC's onsite Waste Water Treatment Unit (WWTU). Efforts were made to reduce the volume of this waste stream by dewatering the waste either via utilizing a centrifuge (API separator sludge) or vacuum trucks (primary sludge) to reduce the volume of the waste.

(ii) A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984:

Waste #1 – Spent Hydrotreating Catalyst

The volumes of the spent catalysts are driven by economics, product demand and process efficiency. A year-to-year comparison is not indicative of the DCRC's waste reduction efforts. Through metal reclamation at Union Corporation, approximately 10% of the molybdenum contained in the spent hydrotreating catalysts was reclaimed in 2014.

Waste #2 - Waste Environmentally Hazardous Substances

The volumes of primary sludge & API separator sludge varies year-to-year as these waste streams are produced episodically via the cleaning of process equipment located at the Facility's WWTP. Therefore, a year-to-year comparison is not indicative of the DCRC's waste reduction efforts.



(a)(6) A certification signed by the primary exporter:

The certification is included as Attachment A

Please contact me at (302) 834-6212 or Michael.Hayes@pbfenergy.com if you have any questions regarding this information.

Sincerely,
Delaware City Refining Company, LLC

A handwritten signature in black ink that reads "Michael Hayes". The signature is written in a cursive, flowing style.

Michael Hayes
Environmental Engineer

Attachment A



Attachment A

Certification by Primary Exporter

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

A handwritten signature in blue ink, appearing to read "Jose Dominguez", is written over a horizontal line.

Jose Dominguez, Refinery Manager

A handwritten date "2/25/15" in blue ink is written over a horizontal line.

Date



cc: Department of Natural Resources and Environmental Control
Solid and Hazardous Waste Management Branch
89 Kings Highway
Dover, Delaware 19901

00042

00100

FedEx Package
Express **US Airbill**
FedEx
Tracking
Number

8019 6577 2568

1 From

Date

2/26/15

Sender's
Name

Michael Hayes

Phone

302 834-6012

Company

DELAWARE CITY REFINING COMPANY

Address

4550 WRANGLE HILL RD

City

DELAWARE CITY

State

DE

ZIP

19706

2 Your Internal Billing Reference

3 To

Recipient's
Name

EPA - Region 1000

Phone

202 272-0167

Company

Office of Enforcement / Compliance Assurance

Address

International Corporate Dr (2254A)

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address

1200 Pennsylvania Ave, NW

Use this line for the H.O.D. location address or for continuation of your shipping address.

City

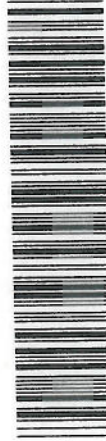
Washington

State

DC

ZIP

20540



8019 6577 2568

Form
FD-503

Recipient's Copy

4 Express Package Service

NOTE: Service order has changed. Please select carefully.

Next Business Day

☐ FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Priority Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☒ FedEx Standard Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx 2Day A.M.
Tuesday Delivery NOT available.

☒ 5 Packaging *Declared value limit \$500.

☒ FedEx Envelope*

☐ FedEx Pak*

☐ FedEx Box

☐ FedEx Tube

☐ Other

6 Special Handling and Delivery Signature Options

☐ SATURDAY Delivery

☐ NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

☐ No Signature Required
No signature is required for delivery.

☐ Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.

☐ Indirect Signature
Someone at a neighboring address may sign for delivery. Fee applies.

Does this shipment contain dangerous goods?

☐ No

☐ Yes

☐ Yes, per attached Shipper's Declaration not required.

☐ Yes, per attached Shipper's Declaration required.

☐ Dry Ice

☐ Dry Ice, UN 1845

☐ Cargo Aircraft Only

7 Payment Bill to:

☒ Sender

☐ Act No. in Section

☐ Recipient

☐ Third Party

☐ Credit Card

☐ Cash/Check

☐ Enter FedEx Acct. No. or Credit Card No. below.

☐ Credit Card Auth.

☐ Credit Card

☐ Cash/Check

☐ Cash/Check

☐ Cash/Check

Total Packages

Total Weight

Total Packages

Total Weight

Total Packages

Total Weight

fedex.com 1.800.GoFedEx 1.800.463.3339

 Packages up to 150 lbs.
For packages over 150 lbs. use the
FedEx Express Freight US Airbill.

 1 H
15.00 2568
02.21

699

694

 FRI - 27 FEB AA
STANDARD OVERNIGHT

 FedEX
TRK# 8019 6577 2568
0215

 20460
DC-US
IAD

EP RDVA



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